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Anna Gercas, Esquire Chambers of The Honorable Harold Baer, Jr. United States District Court for the Southern District of New York Chambers 2230 500 Pearl Street New York, NY 10007-1312

これ・しましいというごりょう AMY L. STRACHAN (PA. NJ) STEPLIEN P. CARNEY (MD) Bryan D. Bolton (MD, PA) Page Plant College (MD) GEVINTERP 40 MP) Filed 08/20/2008(D) SHANI DINOVITA (MD) PATRICK W. THOMAS (MD) ROBERT H. LEVAN (MD. DC. NY) TIMEANY HANNA ANDERSON (MID) CURISTOPLIER W. POVERMAN (MD, DC, NJ). LINDSEY A. RADER (MO) MARIBEL BOIC (MD) JUSTINS, LANDRISH (NY) DIBOHALLR, RMON (MD) DEREK B. YATMIS (MD, DC) KAREN P. RUFF (MID) JEFFERSON L. BLOMOUST (MD) MICHAEL P. CUNNINGHAM (MD. DC) RONALD L. SOLDRRE (PA. DC) MOTOR K. TIERVALA (MD) HISHAM M. AMIN IMIDI JAMES F. TAYLOR (MD) ERNEST A. CROFOOT (MD)

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DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1208

Re: Andrews International, Inc. v. New York City Housing Authority, 08-CV-01580

Dear Ms. Gercas:

Counsel for plaintiff Andrews International and defendant New York City Housing Authority ("NYCHA") jointly submit this letter requesting an amendment to the pretrial scheduling order filed on May 5, 2008. The pretrial scheduling order set this case for the December 2008 trailing trial calendar. No dispositive motion is returnable after September 10, 2008. The parties have exchanged documents and conducted one deposition. The availability of witnesses for deposition, however, has prevented the parties from completing discovery and, in turn, from complying with the current return of motions deadline. Additionally, counsel for NYCHA will be out of the country from the end of this week until mid-July. The parties have agreed on a date for completing the remaining depositions in late July, after Mr. Goodman returns.

The parties respectfully request an amendment of the pretrial scheduling order to extend the discovery deadline to July 31, 2008 and the return of dispositive motions to September 30, 2008. This schedule will not disrupt the placement of this case on the December 2008 trailing trial calendar and will permit the Court at least 60 days to consider the dispositive motions before trial. The parties can provide a proposed amended scheduling order to this effect upon request.

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The Court's attention to and courtesy in this matter is greatly appreciated.

Respectfully,

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Bryan D. Bolton

BDB/sac

cc: Stephen W. Goodman, Esquire (via email and U.S. mail) Christopher E. Dunne, Esquire (via email and U.S. mail)

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